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RACCA

REGIONAL AIR CARGO CARRIERS ASSOCIATION

60 Clifford Road
Plymouth, MA 02360
508.747.1430
Raccaemail@aol.com

FAA-02-14081-35

DEPT. OF TRANSPORTATION
DOCKETS
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March 10, 2003

Docket Management Systems
US Dept. of Transportation
Room Plaza 401,
400 Seventh St. SW
Washington, DC 20590-14081

Re: Transponder Retrofit, Code 7500 Activation Switch *FAA*

The regional Air Cargo Carriers Association is a newly formed not for profit association serving as an advocate for the regional air cargo industry. Our members operate a full range of regional sized aircraft from small piston powered aircraft up to and including large jet fleet operations. The majority of our members operate under FAR Part 135 rules.

Our members' position regarding the proposed switch retrofit of transponders is that of a negative one. There are two primary reasons for this, first safety and the second cost.

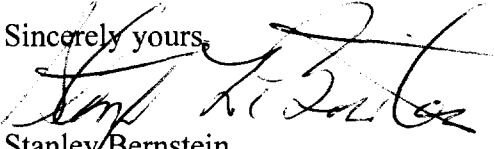
Safety issues regarding this transponder retrofit are real and must be addressed. If an aircraft is taken over by an unauthorized individual (or group), each situation must be dealt with on a unique basis. Often the cockpit turns into a negotiation center dealing with irrational personalities and sometimes outside forces. If the new transponder switch is activated and forces outside the cockpit take over the situation (military aircraft) this may result in a disaster for all aboard. We must not loose sight that, until the most recent terrorist attack, the majority of aircraft takeovers have ended without any loss of life.

The issue of accidental activations of the transponder switch must also be adequately addressed.

The cost consideration is another area that must be addressed. The FAA NPRM indicates the estimated cost of this retrofit to be \$5,178.00 per aircraft. Questions that arise are these estimates based on the current mode "C" transponders or mode "S" transponders? What additional cost will be associated with pressurized vs. non-pressurized aircraft? Will this retrofit require a "stand alone transponder" or will the existing transponder(s) be used? What additional cost will there be if a further modification is necessary to "turn off a false signal"?

The Regional Air Cargo Carriers Association appreciates the opportunity to comment on this proposed rulemaking. We look forward to working with the FAA to help provide a safe and secure air transportation system for all concerned.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Stanley Bernstein", is written over the "Sincerely yours," text.

Stanley Bernstein
President

Regional Air Cargo Carriers Association
60 Clifford Rd.
Plymouth, MA 02360
Tel 508 747-1430
Fax 508 775-4489
Email: raccaemail@aol.com